

**REMARKS**

Claims 1-9 were examined in the Office Action mailed July 25, 2008. The Applicants note with appreciation the Examiner's indication that claims 2-5 and 8-9 recite patentable subject matter.

The following objections and rejections are currently pending:

- Claim 7 stands rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter, as a program without the embodiment of a tangible computer-readable storage medium.
- Claims 1 and 6-7 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,658,385 to Gong, *et al.* ("Gong").

1. **The § 101 Rejection Has Been Addressed.** The Applicants have amended claim 7 in a manner consistent with the Examiner's helpful suggestion. As amended, the claim recites "A computer readable medium storing a noise adaptation program for speech recognition causing a computer to execute a process for adapting a speech model ..." Accordingly, reconsideration and withdrawal of the pending § 101 rejection is respectfully requested.

2. **Claims 1 and 6-7 Are Patentable Over Gong the Reference.** The Applicants respectfully traverse the rejection of claims 1 and 6-7 under § 103(a) as unpatentable over the Gong reference on the ground that this reference does not teach or suggest all of the features of the present invention for which it is cited.

The Applicants note the Examiner's Official Notice that tree structured speech models are a well known type of speech model. However, this and Gong would not result in the present invention.

As described in the Robinson reference (U.S. Patent No. 5,983,180), phone states that compose a word are represented by a tree structure, with words with the same phones being grouped together. One phone state occupies a node of the tree structure.

In contrast, in the present invention the entire Hidden Markov Model ("HMM") with all phones is configured as a group, so that the change in the HMM caused by the type or magnitude of a noise can be represented by a tree structure. Each node of the tree structure corresponds to the type or magnitude of the noise, and the tree structure serves as a group of HMM of all phones. When a general speech recognition technique is employed, as in Gong, one node includes thousands of phone states, and thus even if Gong is combined with a tree structure, the present invention's approach would not result.

Accordingly, reconsideration and withdrawal of the § 103(a) rejection based on the Gong reference is respectfully requested.

### **CONCLUSION**

In view of the foregoing amendments and remarks, the Applicants respectfully submit that claims 1-9 are in condition allowance. Early and favorable consideration and issuance of a Notice of Allowance for these claims is respectfully requested.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #037068.59424US).

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Respectfully submitted,



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